

BAKER BOTTS L.L.P.

John M. Taladay (*pro hac vice*)

Evan J. Werbel (*pro hac vice*)

Thomas E. Carter (*pro hac vice*)

Andrew L. Lucarelli (*pro hac vice*)

700 K Street, N.W.

Washington, D.C. 20001

(202)-639-7700

(202)-639-7890 (fax)

Email: john.taladay@bakerbotts.com

evan.werbel@bakerbotts.com

tom.carter@bakerbotts.com

drew.lucarelli@bakerbotts.com

Attorneys for Defendants

Irigo Group Corp. and

Irigo Display Devices Co., Ltd.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION,

Case No. 07-cv-05944-JST

MDL No.: 1917

THIS DOCUMENT RELATES TO:

ALL INDIRECT PURCHASER ACTIONS

**DECLARATION OF WYATT M.
CARLOCK IN SUPPORT OF IRIGO
DEFENDANTS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
CHUNGHWA MATERIAL SHOULD
BE SEALED PURSUANT TO CIVIL
LOCAL RULES 7-11 AND 79-5(f)**

1 I, Wyatt M. Carlock, declare as follows:

2 1. I am an attorney admitted to practice law in Washington, D.C. and am employed
3 by the law firm of Baker Botts L.L.P., which represents Defendants Irico Group Corporation
4 (“Irico Group”) and Irico Display Devices Co., Ltd. (“Irico Display”) (collectively, “Irico
5 Defendants”). I make this Declaration based on my personal knowledge and in support of the
6 Irico Defendants’ Administrative Motion to Consider Whether Chunghwa Material Should Be
7 Sealed Pursuant to Civil Local Rules 7-11 and 79-5(f).

8 1. Attached hereto as Exhibit 1 is a true and correct copy of a document produced
9 in this litigation by defendant Chunghwa Picture Tubes, Ltd., bearing Bates label
10 CHU00124993-4944E, and filed as Exhibit 2 to Irico Defendants’ Opposition to Indirect
11 Purchaser Plaintiffs’ Motion in Limine #8: To Exclude Character Evidence.

12 I declare under penalty of perjury that the foregoing is true and correct. Executed this 1st
13 day of September, 2023, in Arlington, Virginia.

14 /s/ Wyatt M. Carlock

15 Wyatt M. Carlock (*pro hac vice*)
16 wyatt.carlock@bakerbotts.com
17 BAKER BOTTS L.L.P.
18 700 K St. NW
19 Washington, D.C. 20001
20 Telephone: (202) 639-7723
21 Mobile: (202) 793-1532

22 *Attorneys for Defendants*
23 *IRICO GROUP CORP. and*
24 *IRICO DISPLAY DEVICES CO., LTD.*